

1 Hon. John H. Chun
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FOUNDATION AGAINST)
INTOLERANCE AND RACISM, INC.) Civil Action No. 2:24-cv-01770-JHC
)
Plaintiff,)
)
v.)
)
STEVE WALKER, in his official)
capacity as Executive Director of the)
Washington State Housing Finance)
Commission,)
)
Defendant.)

**DECLARATION OF MONICA
HARRIS IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
THE MOTION TO DISMISS**

I, Monica Harris, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over eighteen years of age. As to the following facts, I know them to
be true of my own knowledge and based on information and belief. If called as a
witness, I would and could competently testify thereto.

2. I am the Executive Director of the Foundation Against Intolerance and
Racism, Inc. (FAIR). FAIR is the Plaintiff in the matter of *Foundation Against
Intolerance and Racism, Inc., v. Steve Walker, in his official capacity as Executive
Director of the Washington State Housing Finance Commission*, No. 2:24-cv-01770
(W.D. Wash. 2024).

1 3. FAIR is a nonprofit, nonpartisan organization that is dedicated to
2 advancing civil rights and liberties for all Americans, and promoting a common
3 culture based on fairness, understanding, and humanity. Through its legal advocacy,
4 FAIR advocates for individuals denied equal protection, free expression, and other
5 fundamental rights, regardless of their personal background or immutable
6 characteristics.

7 4. As Executive Director for FAIR, I am responsible for overseeing FAIR's
8 programs, strategic initiatives, and partnerships. I work closely with FAIR's advisors
9 and Board of Directors to further the organization's objectives and expand its
10 extensive network of local chapters, members, public policy and legal advocacy, and
11 its professional development training programs. I familiarize myself with FAIR
12 members on whose behalf the organization advocates.

13 5. There are members of FAIR who are interested in applying for the
14 Covenant Homeownership Program. Member "A," who is referenced in FAIR's
15 Complaint filed in this matter, is a member of FAIR. She is white and identifies as
16 European-American. She received a VA Home Loan Certificate of Eligibility. She has
17 attended a homeownership counseling program from HomeSight, a HUD certified
18 financial educational and counseling agency. She regularly reviews the HUD website
19 to determine if her local government and neighboring jurisdictions are participating
20 in the Housing Choice Voucher Homeownership Program so she can apply and use
21 the assistance to purchase a home. She is interested in applying for the Covenant
22 Homeownership Program.

23 6. Member A receives Social Security disability and VA disability benefits, a
24 Housing Choice voucher, and Supplemental Nutrition Assistance Program benefits.

25 7. Another member of FAIR resides in King County and is interested in
26 applying for the Covenant Homeownership Program. He has never owned a home,
27 his income is below the median income of his county, and his parents lived in
28

1 Washington before April 1968. This member is white. He is interested in applying for
2 the Covenant Homeownership Program.

3 I declare under penalty of perjury pursuant to 28 U.S.C. 1746 that the
4 foregoing is true and correct based on my own knowledge and on information and
5 belief.

6 DATED 1/23/2025 at New York City, New York.

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8 DocuSigned by:
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11 MONICA HARRIS
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